

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LUDMILA GULKAROV, JANINE
TORRENCE, KELLY MCKEON, and
JOSH CRAWFORD, Individually and
on Behalf of All Others Similarly
Situating,

Plaintiffs,

v.

PLUM, PBC, and PLUM, INC.,
Delaware corporations,

Defendants.

Case No. 4:21-cv-00913-YGR

**[PROPOSED] ORDER DENYING
MOTION TO TRANSFER THESE
RELATED CASES TO THE UNITED
STATES DISTRICT COURT,
DISTRICT OF NEW JERSEY**

Before the Court is Defendants Plum, PBC and Campbell Soup Company's (collectively, the "moving defendants") motion to transfer venue to the District of New Jersey. Having carefully considered the pleadings and the papers submitted, and for the reasons set forth more fully below, the motion to transfer venue is DENIED.

Courts have long recognized that "it is not appropriate to transfer a case on convenience grounds when the effect would be simply to shift the inconvenience from one party to another." *Plascencia v. Lending 1st Mortg.*, 2008 WL 1902698, at *9 (N.D. Cal. Apr. 28, 2008). That is all that a transfer to the District of New Jersey would accomplish here—moving the litigation from a state with weighty contacts, the home district of three plaintiffs, and the state where Plum

1 violated California laws, to New Jersey simply because Movants complain that California is
2 inconvenient to them.

3 For the foregoing reasons, the Court denies the motion to transfer venue to the District of
4 New Jersey.

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6 It is so ORDERED this ____ day of _____, 2021.

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10 Hon. Yvonne Gonzalez Rogers
11 United State District Judge
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